

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Maureen Anita Flanders	:	Case No.: 19-15621-ELF
	:	
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Maureen Anita Flanders, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about September 10, 2019.
2. The Chapter 13 filing was assigned case number 19-15621-elf.
3. The Chapter 13 Plan was confirmed by this Honorable Court on June 2, 2020.
4. On August 17, 2020, Credit Acceptance Corporation filed a Motion for Relief from Stay of the 2017 Kia Sorrento.
5. On or about October 22, 2020, Debtor and Credit Acceptance entered into a Stipulation resolving the Motion for Relief.
6. On February 26, 2021, Credit Acceptance Corporation filed a Certification of Default of the Stipulation resolving the Motion for Relief and on March 9, 2021, relief was granted.
7. Debtor is humbly requesting that she be permitted to modify her Chapter 13 Plan to remove the arrears being paid through the plan to Credit Acceptance Corporation as relief has been granted.
8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", is affordable to the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: April 29, 2021

/s/Brad J. Sadek, Esq.
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